

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF THE  
KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND SCHEME  
LITIGATION

This document relates to: 1:18-cv-04833-LAK, 1:19-cv-01781-LAK, 1:19-cv-01783-LAK, 1:19-cv-01785-LAK, 1:19-cv-01791-LAK, 1:19-cv-01792-LAK, 1:19-cv-01806-LAK, 1:19-cv-01808-LAK, 1:19-cv-01812-LAK, 1:19-cv-01815-LAK, 1:19-cv-01867-LAK, 1:19-cv-01868-LAK, 1:19-cv-01869-LAK, 1:19-cv-01870-LAK, 1:19-cv-01895-LAK, 1:19-cv-01896-LAK, 1:19-cv-01898-LAK, 1:19-cv-01904-LAK, 1:19-cv-01906-LAK, 1:19-cv-01911-LAK, 1:19-cv-01922-LAK, 1:19-cv-01924-LAK, 1:19-cv-01926-LAK, 1:19-cv-01929-LAK, 1:19-cv-10713-LAK

Master Docket 18-md-02865 (LAK)  
ECF Case

**MOTION TO APPEAR  
PRO HAC VICE**

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Andrew S. Dulberg, hereby move this Court for an Order for admission to practice pro hac vice to appear as counsel for Defendants Richard Markowitz, Jocelyn Markowitz, Avanix Management LLC Roth 401(K) Plan, Batavia Capital Pension Plan, Calypso Investments Pension Plan, Cavus Systems LLC Roth 401(K) Plan, Hadron Industries LLC Roth 401(K) Plan, RJM Capital Pension Plan, and the Routt Capital Pension Plan in the above-captioned matters.

I am in good standing with the bar of the Commonwealth of Massachusetts and there are no disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred, or denied admission or readmission by any court. I have attached a declaration attesting to the foregoing pursuant to Local Rule 1.3.

Dated: January 28, 2021  
Boston, Massachusetts

/s/ Andrew S. Dulberg  
Andrew S. Dulberg  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
60 State Street  
Boston, MA 02109  
Tel: (617) 526-6352  
Fax: (617) 526-5000  
andrew.dulberg@wilmerhale.com